

FILED

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

AUG 15 2023

MICHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
**KYLE JOSEPH HARNEY-CHEE,** )  
Defendant. )

) CRIMINAL NO. 23-1256 MLG  
18 U.S.C. §§ 1153 and 1112:  
Involuntary Manslaughter.

INFORMATION

The United States Attorney charges:

On or about January 16, 2021, in Indian Country, in Santa Fe County, in the District of New Mexico, the Defendant, **KYLE JOSEPH HARNEY-CHEE**, an Indian, unlawfully killed John Doe, by operating a motor vehicle without due caution and circumspection and with a wanton and reckless disregard for human life when he knew and should have known that his conduct imperiled the life of John Doe.

In violation of 18 U.S.C. §§ 1153 and 1112.

ALEXANDER M.M. UBALLEZ  
United States Attorney

*Matthew McGinley*  
MATTHEW J. MCGINLEY  
Assistant United States Attorney